## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOHN and DINA APOSTOLAKOS, et al.,	) ) )
Plaintiffs,	Civil Action No. 3:13-cv-05619-MAS- LHG
v.	)
ACCREDITED HOME LENDERS, INC., et al.,	)
Defendants.	) )
	)

# APPLICATION FOR EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE REPLY PURSUANT TO LOCAL CIVIL RULE 6.1(b)

Application is hereby made pursuant to Local Civil Rule 6.1(b) for a Clerk's Order extending the time within which defendants Ocwen Loan Servicing, LLC ("Ocwen Loan"), Litton Loan Servicing LP ("Litton"), and Homeward Residential, Inc. (named as "Homeward Residential, Inc. f/k/a/ American Home Mortgage Servicing, Inc.") ("Homeward") (collectively "Defendants") may answer, move, or otherwise reply to the Complaint filed by Plaintiffs by a period of fourteen days, up to and including October 11, 2013. Defendants represent that:

- Plaintiffs filed the Complaint with the Superior Court of New Jersey, Law Division, Ocean County, on or about July 9, 2013.
- Defendants Ocwen Loan, Litton, and Homeward were served with a copy of the Summons and Complaint on September 6, 2013.
- Defendant Bank of America, N.A. removed the above-captioned case on September 20, 2013, and Defendants Ocwen Loan, Litton, and Homeward filed a Notice of Consent to Removal on September 26, 2013.

- 4. The time for Defendants Ocwen Loan, Litton, and Homeward to answer, move, or otherwise reply to the Complaint expires on September 27, 2013, seven (7) days after the date of removal, pursuant to Fed. R. Civ. P. 81(c).
- 5. No previous extension of time has been requested or obtained.

Dated: September 26, 2013 Respectfully submitted,

OCWEN LOAN SERVICING, LLC, LITTON LOAN SERVICING LP, and HOMEWARD RESIDENTIAL, INC.,

By their attorneys,

#### By: /s/ Mark D. Marino

Mark D. Marino Christopher J. Archer K&L GATES LLP

One Newark Center, Tenth Floor Newark, New Jersey 07102-5285

United States of America Tel: (973) 848-4000 Fax: (973) 848-4001

E-mail: mark.marino@klgates.com E-mail: christopher.archer@klgates.com

R. Bruce Allensworth (*pro hac vice* to be filed) Brian M. Forbes (*pro hac vice* to be filed) Robert W. Sparkes, III (*pro hac vice* to be filed)

K&L GATES LLP

State Street Financial Center One Lincoln Street

Boston, MA 02111 Tel: (617) 261-3100

Fax: (617) 261-3175

E-mail: bruce.allensworth@klgates.com E-mail: brian.m.forbes@klgates.com E-mail: robert.sparkes@klgates.com

## **ORDER**

The above application is GRANTED and the time within which Defendants Ocwen Loan	
Servicing, LLC, Litton Loan Servicing LP, and Homeward Residential, Inc. shall answer, move,	
or otherwise reply to Plaintiffs' Complaint is extended through and including October 11, 2013.	
ORDER DATED:	
WILLIAM T. WALSH, Clerk	
Ву:	
Deputy Clerk	

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 26, 2013, a true and correct copy of the foregoing document was filed with the Clerk of the Court and served upon all counsel of record through the Court's CM/ECF filing system and the Notice of Electronic Filing generated thereby.

/s/ Mark D. Marino

Mark D. Marino